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June 4, 2020

VIA ECF

Honorable Joan M. Azrack
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Civil Action No.: 19-cv-7197 (JMA) (SIL)
Defendant : Stoler of Westbury, Inc.
Plaintiff : Hector Jose
D/Loss : 2/8/18
Our File : IAT1540N19GAK

Dear Judge Azrack:

As you are aware, we represent Stoler of Westbury, Inc. in the above referenced matter. This Court issued a Scheduling Order on May 12, 2020 in light of pre-motion conference letters exchange between our firm and plaintiff's firm. We are requesting a thirty (30) day extension on the dates set forth in that Scheduling Order. The original schedule called for defendants to serve our motion on plaintiff by June 11, 2020; plaintiff to serve oppose to our motion by July 13, 2020; and defendants to reply and file all motion papers by July 28, 2020.

Due to the current COVID-19 measures taken by New York State, our office has been closed since March 21, 2020. We therefore have had limited access to our paper file on this matter, and the information contained therein. An extension would allow this office to better defend the interest of our clients by giving us an opportunity to fully review our file and draft a fully developed motion.

A thirty (30) day extension of time was previously granted by the Honorable Steven I. Locke to our office to Answer the Complaint and/or move for dismissal. Thereafter, a judgment dismissing this matter with prejudice for failure to prosecute was vacated due to plaintiff's entire family being, unfortunately, diagnosed with COVID-19.

Plaintiff's counsel has consented to this extension and to the following new dates: defendants to serve our motion on plaintiff by July 13, 2020; plaintiff to serve their opposition by August 13, 2020; defendants reply and file all documents by August 21, 2020. There are currently no other deadlines or court appearances that would affect this timeline.

We therefore respectfully submit this request to the Court, seeking a 30-day extension on the current Scheduling Order.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'G.A. Kaminska', with a stylized flourish at the end.

Glenn A. Kaminska

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Cc:

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